

**UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND**

WANDA OVALLES, INDIVIDUALLY : Case No. 3:14-CV-137-M-PAS  
AND P.P.A. A.O., AND WILSON OVALLES, :  
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Plaintiff, :  
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 :  
-v- :  
 :  
 :  
SONY ELECTRONICS, INC., BEST BUY :  
CO., INC., FOXCONN INTERNATIONAL, :  
INC., AND JOHN DOE CORPORATIONS 1- :  
4, :  
 :  
 :  
Defendant. :  
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**PLAINTIFFS' RESPONSE TO DEFENDANT, SONY ELECTRONICS INC.'S,  
EMERGENCY MOTION TO EXTEND AND/OR REINSTATE THE TIME  
WITHIN WHICH IT CAN FILE AN OPPOSITION TO THE PLAINTIFFS'  
MOTION FOR SANCTIONS**

On September 16, 2016, plaintiffs moved for sanctions (ECF 94). On September 19, 2016, today, the Court ordered: “Defendant shall file their response as to [94] Motion for Sanctions on or before September 23, 2016.” On the same day, today, after the Court entered its order, Sony Electronics moved for an emergency extension of time to file their response, seeking until September 30, 2016 (ECF 96).<sup>1</sup>

In response to Sony Electronics' emergency motion, plaintiffs point out that we are presently without a date to close fact discovery, to which the litigation of these motions is a contributing factor. As a result, plaintiffs' prosecution of their claims is in limbo. As we indicated at the hearing on September 13, 2016, plaintiffs would like to see a close of fact discovery of October 30, 2016, so every day counts. Furthermore, plaintiffs note that the

<sup>1</sup> Sony Electronics had already requested this relief in Court on September 13, 2016, which the Court denied. At that time, the nature of plaintiffs' motion was already known to both Sony Electronics and the Court.

defendant has intimate knowledge of the material that is the subject of plaintiffs' Motion for Sanctions, having had not only the time originally granted by the Court but an additional two weeks to develop the revised responses that are the subject of the pending motions. The plaintiffs ask that the Court keep these facts in mind when deciding on Sony Electronics' emergency motion.

Dated: September 19, 2016

Respectfully submitted,

PLAINTIFF WANDA OVALLES, INDIVIDUALLY  
AND P.P.A ADRIAN OVALLES, AND WILSON  
OVALLES

By: /s/ Miriam Weizenbaum

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*Attorneys for Plaintiff Wanda Ovalles, on behalf of  
herself and her son, A.O.*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 19, 2016, the foregoing memorandum of law was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF system.

/s/ Miriam Weizenbaum

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